

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>JOHN M. NOLAN, JR.</b>	:	<b>CIVIL ACTION NO. 02-CV-2805</b>
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>READING BLUE MOUNTAIN &amp;</b>	:	
<b>NORTHERN RAILROAD CO.</b>	:	
<b>Defendant.</b>	:	<b>TRIAL BY JURY DEMANDED</b>

**INITIAL DISCLOSURES OF DEFENDANT,  
READING, BLUE MOUNTAIN & NORTHERN RAILROAD COMPANY, INC.**

Pursuant to F.R.C.P. 26 (a)(1), Defendant, Reading, Blue Mountain and Northern Railroad make the following disclosures:

1. The following employees of Defendant have knowledge of the facts set forth in Defendant's Answer to Complaint with Affirmative Defenses:
  - A. Tyler Glass;
  - B. Heather Davidheiser;
  - C. Therman Maderia; and
  - D. Phillip Geschwindt.
2. Each of the names persons may be contacted through counsel for Defendant.

Respectfully Submitted,

---

Paul R. Ober, Esquire  
Attorney for Defendant  
Reading, Blue Mountain  
and Northern